

REMARKS/ARGUMENTS

Reconsideration of this application is respectfully requested.

Claim Objections

The Office Action objected to claim 28 on formal grounds. Claim 28 is amended to traverse the objection.

Claim Rejections -35 U.S.C. § 103

The Office Action rejected claims 19, 25 and 26 under 35 U.S.C. 103(a) as being unpatentable over Betchan et al. in view of Donald et al. Applicant respectfully disagrees.

Betchan et al. teach an assembly for insertion in line into a pipestring of an oil well, for enabling manual rotation of the pipestring by one person. The assembly sits atop of an existing wellhead 2 and is retained thereto by a conventional hammer nut 4 (col. 3, lines 35-37). Leakage of pressure from the well between housing 12 and the wellhead 2 is prevented by an O-ring 70 held captively within housing 12 (col. 4, lines 32-34).

Consequently, as acknowledged in the Office Action, Betcham et al. fail to teach or suggest a metal-to-metal seal between an independent screwed wellhead and a flange mounted thereto.

The relevance of Donald et al. is not understood. Donald et al. describe a method and assembly for recovering production fluids from a well having a tree, using a conduit which is inserted into a production bore to divert the recovered fluids via chemical treatment, pumping or any other apparatus with minimal reduction in the rate of recovery of the production fluids (abstract). The primary focus of the invention made by Donald et al. is offshore oil or gas wellheads (col. 3, lines 5-7). As is well known in the art, offshore, i. e. sub sea, oil and gas wells are always provisioned with flanged wellheads. Independent screwed wellheads are not used in such installations for a variety of reasons well understood by those skilled in the art.

Furthermore, although Donald et al. mention in column 2, lines 38-40 that "Seals between the cap and bores of the tree are optionally O-ring, inflatable, or preferably metal-

to-metal seals.”, the relevance of this statement is not understood for at least two reasons, namely:

- 1) It is well known that flanged wellheads have for many years used metal ring gaskets that are crushed between mating components by the compressive forces achievable by carefully torquing the many bolts that hold together each flanged connection in a predetermined sequence. However, the use of metal ring gaskets for a metal-to-metal seal for an independent screwed wellhead has, prior to the instant invention, been unknown.
- 2) Donald et al. do not show, explain or suggest what is meant by their metal-to-metal seal. It is therefore respectfully submitted that the teachings of Donald et al. could not lead a person of ordinary skill in the art to the invention because their mere mention of metal-to-metal seals contributes nothing to the prior art.

Nonetheless, to facilitate prosecution of the present application, applicants have amended claims 19 and 25 to add structure that defines the invention in more narrow terms. In particular, claim 19 is amended to include limitations associated with the drilling flange that were imported directly from claim 20, deemed allowable. Claim 25 is amended to introduce structural features of the independent screwed wellhead described in paragraphs [0038] and [0040] of the specification as filed. It is respectfully submitted that those structural features added to claim 25 clearly distinguish over the teachings of Betchan et al. and Donald et al., as well as any combination of the teachings of the prior art made of record.

Claim 26 is amended to provide proper antecedent for “lockdown nut” in view of the amendments made to claim 25.

In view of these amendments, it is respectfully submitted that the rejection of claims 19, 25 and 26 is traversed.

The Office Action rejected claim 27 under 35 U.S.C. 103(a) in view of Donald et al. and applicant’s co-invented, commonly owned published application 2004/0231856. In view of the amendments made to claim 25, the combination of Donald et al. and the commonly owned published application neither teaches nor suggests the invention claimed in claim 27.

The Office Action further rejected claims 28-30 as being unpatentable in view of applicant's co-invented commonly owned published application in view of Donald et al. Applicant challenges the Official Notice of the equivalence of O-rings and metal-to-metal seals for their use in the wellhead art on the grounds that the selection of any of these known equivalents to form the seal between the wellhead and the flange would be within the level of ordinary skill in the art. An object of the present invention is to provide a drilling flange and an independent screwed wellhead that provides a metal-to-metal seal. To the best of applicant's knowledge, an independent screwed wellhead that provides a metal-to-metal seal is novel and inventive. Prior art screwed independent wellheads did not provide a metal-to-metal seal, and relied exclusively on an elastomer seal, such as an O-ring seal.

The rejection of claims 28-30 is thereby traversed.

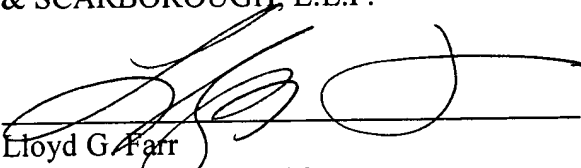
Allowable Subject Matter

Applicant gratefully acknowledges that claims 2-18 and 20-24 are allowed.

However, in view of the amendment of claims 19, 25, 26 and 28 and for reasons set forth above in detail, it is respectfully submitted that each of claims 19 and 25-30 are also now in a condition for immediate allowance. Favourable reconsideration and early issuance of a Notice of Allowance are requested.

Respectfully submitted,

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